

Category #37:

The Guidelines should restrict the use of disinfectant/sanitization cleaning products.

State Response:

OGS recognizes that disinfectants and sanitizers must be used in certain areas and circumstances in schools. A new section (entitled *Related Rules and Guidelines*) has been added to the OGS Guidelines to clearly explain where existing regulations and guidance require the use of a disinfectant or sanitizer. The Guidelines do not establish criteria for environmentally sensitive disinfectants or sanitizers.

The public health benefit of using disinfectants and sanitizers as part of routine cleaning is a controversial topic. Cleaning with soap or detergent and water removes large numbers of microorganisms from surfaces (Schulster *et al.*, 2004). Furthermore, cleaning is a necessary first step to sanitization or disinfection because many soils will reduce the effectiveness of a sanitizer or disinfectant. Unless disinfectant cleaners are used according to the label requirements for use as a sanitizer/disinfectant, the product could be providing no antimicrobial function and only contributing to an increased, unnecessary load of antimicrobial agent to the environment. These label requirements require that a surface first be cleaned and then kept wet with a fresh solution of the product for several minutes to sanitize the surface. In schools, routine sanitization of all floors is not considered necessary. Thus, the OGS Guidelines permit the routine use of disinfectant cleaning products in bathrooms and permit the necessary uses of disinfectants in other situations, as covered in regulations and guidance described in the Guidelines.

A particular product or process was suggested as an effective disinfectant and cleaning solution. To be sold or used in NYS, any product that makes a disinfecting or sanitizing claim must be registered by USEPA and by NYSDEC or contain active ingredients that are exempt from such registration. When used, the label precautions and use instructions must be strictly followed. These concepts are clearly explained in guidance presented in Section III.C of the OGS Guidelines.

Reference

Schulster LM, Chinn RYW, Arduino MJ, Carpenter J, Donlan R, Ashford D, Besser R, Fields B, McNeil MM, Whitney C, Wong S, Juranek D, Cleveland J. Guidelines for environmental infection control in health-care facilities. Recommendations from CDC and the Healthcare Infection Control Practices Advisory Committee (HICPAC). Chicago IL; American Society for Healthcare Engineering/American Hospital Association; 2004. Available at: www.cdc.gov/ncidod/hip/enviro/guide.htm

Frequently Asked Public Comment:

Disinfectant/Sanitization Related Issues

--Our company manufactures a general purpose spray and wipe disinfectant. It is EPA registered and registered with the NYS DEC. I know that Green Seal does not touch general purpose disinfectants, and that these products are not covered by the proposed guidelines. If a school in NYS identifies a need for a general purpose disinfectant, and does not find one on the green product list, how are they to purchase it? How would we go about having our product "listed or included on contract by OGS" as it says on page 7 of the document? Other than requiring specific procedures and training in the use of disinfectants, is their use limited in any other way in NYS schools? Thank you for your time and consideration!

(David Crosbie, Environmental Marketing and Research, Spray Nine Corporation)

--Regarding products that claim to sanitize or disinfect, the terms "sanitize" and "disinfect" should be defined. For instance, many define any kind of cleaning as sanitizing.

(Deborah Lema, Research and Education, Racine Industries, Inc.)

--With reference to products used to disinfect, we advocate prohibitions against the use of these products for general cleaning purposes and directives for use only for body fluid spills, in areas where there is a high potential for direct contact with body fluids, or when a public health concern or regulation of the Department of Health or Center for Disease Control requires their use.

(Janet Foley, Director, Occupational Safety and Health, Civil Service Employees Association, CSEA)

--While it is good that you promote the fact that it is better to clean effectively over disinfecting, we suggest that you also promote sanitizing over disinfecting due to the near kill claims but with significantly less dwell time, cost, and impact on human and environmental health.

(Mike Sawchuk, Vice President and General Manager, Enviro-Solutions)

--No cleaning product be a combination of disinfectant and cleaner. Disinfectants are registered pesticides and should never be used for general cleaning purposes or when children are present. The most effective control strategy in battling infection is good cleaning. According to the Center for Disease Control: "The actual physical removal of microorganisms by scrubbing is probably as important, if not more so, than any antimicrobial effect of the cleaning agent used". Although microorganisms are a normal contaminant of walls, floors and other surfaces, these environmental surfaces rarely are associated with transmission of infections to patients or personnel. Therefore, extraordinary attempts to disinfect or sterilize these environmental surfaces are rarely indicated. However, routine cleaning and removal of soil are recommended.

(Dr. Daniel Lefkowitz, Yorktown Heights, NY)

--Item III, sub-item C. We have not seen any studies that indicate that a two step clean and disinfect policy is preferred to a one-step clean and disinfect product, based on life cycle analysis. In many cases, a one step process is often preferred, due to reduction in cost of labor and the fact the user only needs one product (not two). We are concerned that this policy is an attempt to circumvent EPA jurisdiction in this area, to promote greener and safer chemistries. The fact is, disinfectants are pesticides, and that they all should be treated equally on a user basis. Until EPA provides direction regarding use of green pesticides, our recommendation is to follow use instructions as provided on the label, without preference for one procedure vs. another.

(Chuck Hodge, Scientist, Ecolab Inc., Eagan, Minnesota)

--RESTRICTIONS ON DISINFECTANT USAGE

The proposed document discusses disinfection as an arbitrary step in the maintenance of school premises "only when and where necessary". There is no indication of the criteria that would be used to determine the need for disinfection or who would make the decision on when disinfectant should be used. Additionally, the guidelines strictly prohibit the use of all disinfectant and sanitizing products except those used strictly in the bathroom.

Disinfection is an important step in reducing the transmission of organisms of public health concern. While it is important to disinfect bathroom surfaces, there are many other areas within schools where disinfection is also important. It is particularly critical that food preparation areas and surfaces be cleaned and disinfected (or sanitized) to meet local and state public health and safety codes. The State's Department of Health has guidelines for sanitizing food preparation areas. It is also important that surfaces that frequently come into contact with hands be routinely cleaned and disinfected to prevent the spread of disease causing organisms in order to reduce the likelihood of widespread transmission of illnesses. Locker rooms, shower areas and sports equipment must be disinfected as well to prevent athlete's foot fungus outbreaks and eliminate blood borne pathogens from surfaces, such as wrestling mats. The Center for Disease Control recommends both cleaning and disinfecting as a means of helping control infectious diseases. Therefore, in addition to disinfectant bathroom cleaners, schools must have access to efficacious disinfectant general purpose cleaners and specialty disinfectant/sanitizer products (such as food surface sanitizers) to meet the wide range of needs. As disinfectant cleaners serve two purposes (clean and

disinfect) they provide an economical means of achieving the goal of keeping schools clean without having to purchase additional inventory.

All disinfecting and sanitizing products must go through a rigorous registration process by the United States Environmental Protection Agency (USEPA) and state agencies, such as the New York Department of Environmental Conservation (NYDEC). The registration process includes toxicological and environmental evaluations of registered products. USEPA also has a reregistration program that reevaluates the safety and environmental profile of products to ensure that the use of products does not present unreasonable adverse risks when used. Under the Food Quality Protection Act, EPA is mandated to take into account the exposure of children to products in establishing risk by imposing additional safety factors for children's exposure.

INCORRECT DESCRIPTION OF DISINFECTANT PRODUCTS

We are perplexed with the description of "disinfectant-detergent" found in Appendix # 17. The description indicates that these products are "formulated to leave a sticky germicide film (residue) on a surface after drying. The residual has an active time of 6± hours or until it gets contaminated by soil". The majority of disinfectant cleaning products do not have residual activity and are specifically formulated to NOT leave a sticky residue. Additionally, there are disinfectant and sanitizer products specifically developed for use on food contact/preparation surfaces. USEPA registers products for these uses. State and local health departments have guidelines for the use of these products on these surfaces.

(Eileen J. Moyer, Director of Regulatory Relations, Reckitt Benckiser North America, Parsippany, NJ)

--Finally, we urge that Sections I and III be revised as suggested in Appendix A to these comments so that those implementing these Guidelines do not inadvertently increase the health risk to children and school staff by failing to clean, disinfect, and sanitize in the schools as often, as thoroughly, or as with the most effective product to manage exposure to microbial contaminants.

(Submitted by Geoff Hall, State and Local Affairs Manager, Northeast Region, American Chemistry Council, Albany, NY on behalf of Stephen Rosario, Executive Director, NYS Chemical Alliance and William F. Carroll, Ph.D, Acting Managing Director, Chlorine Chemistry Council)

--Disinfection. Application of pesticides to surfaces children come in contact with can create unsafe conditions. There are residues left on surfaces either cleaned with a disinfectant or by application of a disinfectant after cleaning. Recommendation. All surfaces treated with a disinfectant must be rinsed.

(Michael Rochon, Cogent Environmental Solutions, Caledon, ON, L0N 1C0)

--Water Journey, the makers of Hands2GO, a natural hand sanitizer, applaud you in your effort to require schools in New York to adopt a comprehensive green cleaning policy. As you know, hand washing is a key component in a child's personal hygiene as well as preventing the spread of infectious diseases. School districts need to do everything in their power to prevent the spread of germs which of course leads to absenteeism among both the student and teacher populations. It is important that products chosen to combat harmful germs in our schools do not compromise respiratory function in a child or interfere with a child's normal developmental processes.

I am enclosing an information packet and some samples of Hands2GO. I hope you will find that this product is the perfect "green solution" for hand sanitizing in New York state schools. Hands2GO is already an approved vendor for the Los Angeles Unified School District of California.

What makes Hands2GO's patented formula so unique is that it is a natural, foaming water based solution. It is gentle on the hands, yet clinically proven to kill 99.9% bacteria. It is one of the few alcohol-free products on the market, making it non-flammable and safe for a school environment. Unlike alcohol gels, Hands2GO is fragrance free (your hands are not left smelling medicinal) and when applied, leaves the hands not sticky but moisturized with aloe vera, lavender, and chamomile. By the way, school nurses also love the product because it is a non-stinging anti-septic that can be applied to cuts and bruises.

I thank you for your time and welcome any questions you may have about Hands2GO. If Water

Journey can assist you in anyway in implementing a "green solution" for New York state schools, please allow us to assist you. I can be reached at 203-322-5130 or at aroberts@waterjourney.com.
(Allison Roberts, Director of Sales, Water Journey, Stamford, CT)

--(D) The Arbitrary Exclusion of a Wide Range of Disinfectant and Sanitizing Products Will Have Profound Adverse Effect on the Health and Safety of School Children

Disinfectant and sanitizer products have a wide variety of public health benefits and are regulated by both the New York State Department of Environmental Conservation (DEC) and the U.S. Environmental

Protection Agency (EPA).⁹ Thus, CSPA strongly supports the OGS' proposed requirement that any product making a disinfectant or sanitizing claim must be registered by both agencies. To be registered by DEC and EPA, these products are subject to thorough testing that includes data requirements for product chemistry, efficacy, toxicology, and environmental fate. EPA also conducts an extensive risk assessment, including any possible risks associated with exposure following an application of the end-use product.

Disinfectant and sanitizing products provide significant public health benefits. For example, these products are used in schools to control the spread of food poisoning and like diseases caused by E. coli and Salmonella. The use of disinfectants and sanitizer products in school health facilities (e.g., nurse's office) is essential for helping to prevent the spread of disease and illness. These products are used to control contaminants such as bacteria and mold that can cause severe health problems for children, adults — and in particular, persons with compromised immune systems. Furthermore, the proper use of disinfectants and sanitizers improve indoor air quality by controlling harmful biological contaminants, such as mold, cockroach allergens, dust mites and other insect dander.

In light of the significant public health benefits derived from the use of these products, CSPA has serious concerns that the OGS' proposed guidelines arbitrarily excludes the use of general-purpose cleaners that are registered as disinfectants and sanitizers. Under the proposed guidelines, the use of registered disinfectants and sanitizers is only permitted in bathroom cleaners. Such an unreasonable restriction could have profound adverse health impacts on school children, school faculty and staff. For example, if a school suffered a serious flu outbreak, the use of disinfecting and sanitizing cleaning products would be the most efficacious means to reduce and control the health threat. In addition, New York States' Department of Health stipulates that food preparation areas must be clean and sanitary.¹⁰

OGS should give weight to the positive health benefits that products provide by disinfecting, cleaning, pest control, and maintaining healthy, clean and safe indoor environments and balance these benefits against the serious impact of biological contaminants (mold, cockroach allergens, dust mites, etc) on indoor environments. OGS should not include any restrictions on public health related products, disinfectants, sanitizers, or antimicrobial products used in public places. These products are highly regulated at both the federal and state level and therefore should not be subject to additional EPP requirements.

⁹ New York State law requires every pesticide product that is used, distributed, sold or offered for sale in the state must be registered with the DEC. NY Env'tl. Conserv. Law § 33-0701. At the federal level, these products are regulated pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). 7 U.S.C. §§ 136-136.

¹⁰ NYS Department of Health Food Safety for the Volunteer Worker -[http://www.health.state.ny.us/nysdoh/enviro/food/food safety.htm](http://www.health.state.ny.us/nysdoh/enviro/food/food%20safety.htm)

(Robert J. Kiefer, Director, Scientific and International Affairs and Joseph T. Yost, Director, State Affairs, (CSPA), Consumer Specialty Products Assoc., Washington, DC)

--**Designation of Approved Products.** In reference to Section V, Designation of Approved Products, paragraph B, Section 1 (GS-37), the very last bullet point in this section would seem to preclude the procurement and use of any disinfectant or sanitizer other than a combination bathroom cleaner / disinfectant as contemplated in GS-37.

If this is the intent of this section we disagree with this approach as it would be contrary to the maintenance of sanitary and healthful conditions in schools.

We agree generally with language elsewhere in the Guidelines that would limit the use of disinfectants or sanitizers only “when and where necessary.” In fact there are a number of occasions in which the use of disinfectants and sanitizers are needed on a daily basis in schools for the purpose of ensuring a sanitary and healthful environment. For example, in cafeteria areas, it is necessary to sanitize food contact surfaces. In bathrooms, it is necessary to disinfect toilets, sinks and waste receptacles. Accidents that result in minor blood spills must also be disinfected.

If the OGS limits schools to using only combination bathroom cleaners / disinfectants, schools may not have the appropriate tools by which to properly disinfect or sanitize certain surfaces. By law U.S. EPA registered products such as disinfectants and sanitizers must be used in a manner consistent with the product label. While a combination bathroom cleaner / disinfectant may be appropriate for disinfecting bathroom surfaces, it is quite likely not approved for use as a food contact sanitizer or as an appropriate disinfectant for cleaning up blood spills. Thus, its use in these contexts would be both a violation of federal law and also would not provide the appropriate level of disinfection / sanitization.

Therefore we urge OGS to reconsider its treatment of disinfectants and sanitizers in the Guidelines.

In regard to disinfectants and sanitizers, ISSA recommends that OGS adopt an approach similar to that which was adopted by the State of Massachusetts. In effect Massachusetts requires that these products meet the specifications of GS-37 except for the active ingredients with respect to biodegradability.

(Bill Balek, Director of Legislative Affairs, ISSA, Lincolnwood, IL)

--Appendix A – Suggested Revised Text to Overview of Guidelines

I. OVERVIEW

A. Purpose of Guidelines

...The goal of using environmentally sensitive cleaning and maintenance products is to reduce, as much as possible, exposure of children and school staff to potentially harmful chemicals and substances used in the cleaning and maintenance of school facilities. This goal must work hand in hand with the requirement that cleaning products clean effectively by insuring the removal of soil from surfaces without damaging the surface and virtually leaving no soil or chemical residue. In addition, these Guidelines recognize the importance of protecting students and employees from microbial hazards in schools. The safe and effective use of registered anti-microbial products is an important part of maintaining a healthy school environment, and should not be compromised by the implementation of these Guidelines.

(Submitted by Geoff Hall, State and Local Affairs Manager, Northeast Region, American Chemistry Council, Albany, NY on behalf of Stephen Rosario, Executive Director, NYS Chemical Alliance and William F. Carroll, Ph.D, Acting Managing Director, Chlorine Chemistry Council)